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October 21, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

Re: CC Dkt. 95-116, Local Number Portability

Dear Ms. Dortch,

On October 21, the undersigned of BellSouth met with Martha Contee, Perlesta Hollingsworth, and Suzanne Perrin of the Consumer and Governmental Affairs Bureau and Narda Jones, Cheryl Callahan, Pam Slipakoff, and Sandford Williams of the Wireline Competition Bureau. Bill Shaughnessy, Mo Andriate, and Brenda Evans of BellSouth participated via conference call. The purpose of the meeting was to provide an update on BellSouth's experience to-date with intermodal Wireless Local Number Portability. All material provided during the meeting is attached.

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions regarding this filing please do not hesitate to contact me at (202) 463-4109 or Kathie Levitz at (202) 463-4113.

Sincerely,



Mary L. Henze

cc: N. Jones
C. Callahan
M Contee
P. Slipakoff
S. Perrin
S. Williams
P. Hollingsworth

BellSouth Updated Analysis of WLNP Intermodal Issues

1) Purpose:

- a) Provide third update on intermodal porting (wireline to wireless & wireless to wireline) problems experienced by BellSouth.

2) Highlights:

- a) Ports in Error have stabilized at approximately 7%.
 - i) In first months of WLNP the error rate was approximately 30%.
- b) Overall, WSPs have made progress in learning the process for resolving ports in error but some carriers continue to have a high error rate and are less responsive to resolving issues.
- c) WSPs still need to increase knowledge of the business rules for porting:
 - i) WSPs and their vendors should utilize pre-order validation functionality and the Customer/Reference Guides to assure correct information is submitted on the LSR.
 - ii) WSPs and their vendors must assume the responsibility for submitting a complete and error free LSRs.
- d) FCC needs to ensure that the NANC's Change Order #375 is implemented in the next NPAC software release:
 - i) This Change order addresses PIM 22 from the LNPA Working Group.
 - ii) With this Change Order, the old service provider can only remove ports put into conflict status with a cause code 50 or 51 from conflict.
 - iii) NANC directed the LNPA to include this change order in the next NPAC Release package

3) Background:

- a) On 3/2/04, BellSouth provided analysis on intermodal porting problems experienced by BellSouth since the beginning of WLNP on 11/24/03:
 - i) BellSouth established an interim process to address “backlog” of “half-ported” TNs.
 - ii) BellSouth increased communication with WSPs
 - iii) BellSouth's ‘root cause’ analysis indicated that most WLNP porting problems involve WSPs using the same service bureau.
- b) On 6/04 BellSouth provided second update on WLNP Intermodal Issues:
 - i) Most WSPs were making progress on root-cause analysis of problem ports.
 - ii) The availability of WLNP in non-top 100 MSA markets beginning May 24 could possibly result in new issues.

4) **BellSouth Analysis of Intermodal Port-in-Error:**

- a) Total ports increased due to WLNP expanding to non-top 100 MSA. Port in Error rate not impacted:

Port in Error

Timeframe	Total Intermodal Ports	Ports in Error	% Of Total	# Exec Appeals
Dec - Feb	2086	628	30	109
March/April	2472	236	10	69
May/June	3675	242	7	71
July/August	4267	281	7	44
Total	12,500	1387	11	293

- b) Intermodal Ports-in-Error By Carrier/Month:

TOP 15 WSPs

WSP	May		June		July		Aug	
	Total Ports	# / % Error						
WSP #1	228	7 (3%)	535	21 (4%)	456	28 (6%)	480	20 (4%)
WSP #2	153	26 (17%)	286	45 (16%)	178	26 (15%)	190	18 (9%)
WSP #3	306	21 (7%)	609	22 (4%)	498	32 (6%)	568	39 (7%)
WSP #4	158	20 (13%)	297	18 (6%)	244	15 (6%)	298	24 (8%)
WSP #5	41	0 (0%)	129	1 (1%)	91	2 (2%)	82	1 (1%)
WSP #6	116	6 (5%)	121	6 (5%)	134	6 (4%)	166	11 (7%)
WSP #7	151	13 (9%)	213	7 (3%)	237	8 (3%)	218	7 (3%)
WSP #8	24	2 (8%)	41	5 (12%)	45	4 (9%)	26	3 (12%)
WSP #9	25	1 (4%)	31	1 (3%)	49	0 (0%)	46	1 (2%)
WSP #10	10	1 (10%)	36	1 (3%)	35	1 (3%)	28	0 (0%)
WSP #11	0	-	28	2 (7%)	16	2 (13%)	22	0 (0%)
WSP #12	0	-	37	2 (5%)	56	27 (48%)	30	0 (0%)
WSP #13	0	-	6	2 (33%)	29	0 (0%)	8	1 (13%)
WSP #14	0	-	6	4 (67%)	2	2 (100%)	3	0 (0%)
WSP #15	0	-	0	-	14	2 (14%)	18	1 (6%)